

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

LINETTE EDMOND COLLINS,

Plaintiff,

v.

AETNA LIFE INSURANCE COMPANY
AND AETNA INC.,

Defendants.

Civ. No. 1:19-cv-01400

Hon. Ronald A. Guzman

JOINT STIPULATION FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Plaintiff Linette Edmond Collins (“Plaintiff”) and Defendants Aetna Life Insurance Company and Aetna Inc. (“Defendants”) (collectively, “the Parties”), through their respective counsel, hereby stipulate as follows:

1. Plaintiff filed the Complaint on February 26, 2019, ECF No. 1, and an Amended Complaint on May 13, 2019, ECF No. 32. Defendants assert that Plaintiff is bound to individually arbitrate her claims and were prepared to file a motion to compel individual arbitration.
2. The Parties stipulate that the above case be dismissed *without prejudice* and without costs to any party pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).
3. Subject to and without waiving any of their defenses to Plaintiff’s claim (including but not limited to any and all defenses as to the timeliness of Plaintiff’s original filing in this case and all jurisdictional defenses), Defendants and their subsidiaries and affiliates, including Aetna Medicaid Administrators, LLC, agree to toll the statute of limitations for Plaintiff’s individual Fair Labor Standards Act and individual Illinois Minimum Wage Law claim from the date the Complaint was filed through July 20, 2019, to the extent that Plaintiff files such claims in arbitration.

4. Plaintiff in turn agrees that if she re-files these claims in arbitration, she will file only an individual arbitration and she will not file class or collective arbitration claims.

Respectfully submitted,

By: /s/ Douglas M. Werman

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Date: May 22, 2019

By: /s/ Sari M. Alamuddin (with consent)

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Date: May 22, 2019